

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re: Geoffrey Howard Richardson) Case No: 15-30197
Heidi Lyn Richardson)

**TRUSTEE'S OBJECTION TO EXEMPTIONS
AND NOTICE OF OBJECTION**

COMES NOW, Susan H. Call, Counsel for Carl M. Bates the Chapter 13

Trustee, pursuant to Federal Rule of Bankruptcy procedure 4003(b), and as for her
Objection to Exemptions taken by the Debtors in property of this estate, states as follows:

1. On January 15, 2015, Geoffrey Howard Richardson and Heidi Lyn Richardson
("Debtors") filed a voluntary petition under Chapter 13 of the United States Bankruptcy
Code.

2. Carl M. Bates is appointed Chapter 13 Trustee in this case and continues to
serve as Trustee.

3. The first meeting of creditors was held on March 5, 2015 and was concluded.

4. Debtors, in Schedule C, of their Bankruptcy Petition ("Schedule C") have
indicated that they are claiming equity in "garnishment refund" (hereinafter known as
"garnishment") in the amount of \$1,776.04 and "2004 BMW X-5 130,000 mi"
(hereinafter known as "BMW") in the amount of \$3,950.00 exempt under Virginia Code
Ann. 34-4 totaling \$5,726.04 for Mrs. Richardson.

5. Susan H. Call, Counsel for the Chapter 13 Trustee, avers that the exemption
claim for "garnishment" and "BMW" under Virginia Code Annotated 34-4, should be
disallowed to the extent they exceed the \$5,000.00 for Mrs. Richardson.

Susan H. Call, Esquire
Staff Counsel for
Carl M. Bates
P.O. Box 1819
Richmond, VA 23218-1819
(804) 237-6800
VSBN 34367

WHEREFORE, the Chapter 13 Trustee, by Counsel, prays for entry of an Order by this Court: determining that the exemptions taken by the Debtors, with respect to the aforementioned “garnishment” and “BMW” claimed exempt on Schedule C, is improper and should be limited to \$5,000.00 for Mrs. Richardson, since that is the limit she is entitled to under Virginia Code Ann. 34-4, and granting such other and further relief as is just.

/s/Susan H. Call
Susan H. Call,
Counsel for
Carl M. Bates
Chapter 13 Trustee

Certificate of Service

I hereby certify that on March 19, 2015, I have mailed or hand-delivered a true copy of the foregoing Objection to Exemption to the debtor(s), Geoffrey Howard and Heidi Lyn Richardson, 11011 Merganser Terrace, Chesterfield, VA 23838 and electronically sent to debtor’s attorney, Sean D. Contreras, Esquire, at sean.c13alg@gmail.com.

/s/Susan H. Call
Susan H. Call, Counsel for
Carl M. Bates
Chapter 13 Trustee

Susan H. Call, Esquire
Staff Counsel for
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UNITED STATES BANKRUPTCY COURT
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RICHMOND DIVISION

In re: Geoffrey Howard Richardson) Case No: 15-30197
Heidi Lyn Richardson)

Debtors' Address 11011 Merganser Terrace
Chesterfield, VA 23838

Last four digits of Social Security No(s): 7593
1785

NOTICE OF OBJECTION TO EXEMPTIONS

Carl M. Bates, by Counsel, the Chapter 13 Trustee in Bankruptcy (the "Trustee") has filed a **"TRUSTEE'S OBJECTION TO EXEMPTIONS"** (the "Objection") with the Court, seeking to disallow exemptions in property claimed by debtors, Geoffrey Howard Richardson and Heidi Lyn Richardson (the "Debtors").

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to sustain the Objection, or if you want the court to consider your views on the Objection, you or your attorney must: File with the court, on or before **twenty-one days** from the service date of this Notice, at the address shown below, a written response to the Objection requesting a Hearing.

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

Susan H. Call, Esquire
Staff Counsel for
Carl M. Bates
P.O. Box 1819
Richmond, VA 23218-1819
(804) 237-6800
VSBN 34367

You must also mail a copy to:

Susan H. Call
Counsel for Carl M. Bates, Chapter 13 Trustee
P. O. Box 1819
Richmond, VA 23218

Attend a hearing to be scheduled at **April 29, 2015 at 11:10 am at The United States Bankruptcy Court for the Eastern District of Virginia, 701 East Broad Street, Room 5000, Richmond, Virginia 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the request and permit the sale to proceed without further action of the Court.

Date: March 19, 2015

/s/Susan H. Call
Susan H. Call, Counsel for
Carl M. Bates
Chapter 13 Trustee

Certificate of Service

I hereby certify that on March 19, 2015, I have mailed or hand-delivered a true copy of the foregoing Notice of Objection to Exemption to the debtor(s), Geoffrey Howard and Heidi Lyn Richardson, 11011 Merganser Terrace, Chesterfield, VA 23838 and electronically sent to debtor's attorney, Sean D. Contreras, Esquire, at sean.c13alg@gmail.com.

/s/Susan H. Call
Susan H. Call, Counsel for
Carl M. Bates
Chapter 13 Trustee

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